

**Federal Defenders  
OF NEW YORK, INC.**

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April 10, 2020

*VIA ECF*

Honorable Colleen McMahon  
Chief United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

MEMO ENDORSED

OK  
Colleen McMahon

Re: *United States v. Camacho*, 19 CR 389 (CM)

Dear Judge McMahon:

With the consent of the government and Pretrial Services, I write to seek a modification to the conditions of Mr. Camacho's release. Mr. Camacho resides in Texas and is employed as a truck driver. Currently, the conditions of his release restrict his travel to the Southern and Eastern Districts of New and all districts of Texas. In light of the COVID-19 pandemic, there is a great need (and a desire on Mr. Camacho's part) for truck drivers to take loads of food and supplies across the country. Mr. Camacho asks that his travel restrictions be expanded to include all states within the continental United States so that he can travel for work.

Thank you and I hope you and your loved ones remain safe.

Respectfully submitted,

/s/ JULIA GATTO

Julia L. Gatto  
Assistant Federal Defender  
212.417.8750

cc: AUSA Daniel Nessim (via ECF)  
USPO Julio Taboada (via email)

